

STATEMENT OF BASIS (AI No. 88042)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0114839 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Marmac, LLC
Munson Slip Fleet
1750 Clearview Parkway
Metairie, LA 70001

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Yvonne Baker

DATE PREPARED: January 29, 2007

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of an Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LPDES permits -- LA0114839
LPDES permit effective date: June 1, 2002
LPDES permit expiration date: May 31, 2007

D. Date Application Received: November 16, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - barge fleeting rental and repair facility

This is an existing barge fleeting area. Minor repairs to the barges also take place at the Munson Slip Fleet location. These repair activities do not result in any discharges. Barges at the site are leased to customers to carry products including dirt, mud, wood, sand, steel slag, crushed rocks and construction equipment. Barges leased by Marmac LLC are primarily deck barges. Barges are moored to the site and residual solid material from the deck surface is removed by sweeping. The deck is then washed down. If oily residue is present on the barge surface, the facility will send the barge to another facility for washing. Ballast and void water from customer leased and facility barges are also discharged from the facility.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 4499

C. LOCATION - 550 Thompson Road at the Munson Slip in Houma, Terrebonne Parish
Latitude 29 32' 36", Longitude 90 41' 46"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: dry commodity barge washwater from deck barges
Treatment: none
Location: at the point of discharge from the barge being washed prior to mixing with other waters
Flow: intermittent
Discharge Route: via the Munson Slip to the Houma Navigational Canal

Outfall 02A

Discharge Type: incoming ballast and void water from customer leased barges
Treatment: none
Location: at the point of discharge from the customer leased barge void/wing tanks prior to mixing with other waters
Flow: intermittent
Discharge Route: via the Munson Slip to the Houma Navigational Canal

Outfall 02B

Discharge Type: maintenance ballast and void water from spar barges
Treatment: none
Location: at the point of discharge from the spar barge void/wing tanks prior to mixing with other waters
Flow: intermittent
Discharge Route: via the Munson Slip to the Houma Navigational Canal

4. RECEIVING WATERS

STREAM - via the Munson Slip to the Houma Navigational Canal

BASIN AND SEGMENT - Terrebonne Basin, Segment 120509

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. drinking water supply

5. TMDL STATUS

Subsegment 120509, Houma Navigational Canal - Houma to Bayou Pelton, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

No changes were made from the previous permit.

7. COMPLIANCE HISTORY/COMMENTS

1. WQMD – An inspection on June 10, 2004 noted no areas of concern.
2. DMR Review/Excursions – A DMR review of years 2004 and 2005 noted no excursions. 23 of the 24 DMRs were marked "No Discharge." No DMRs were on file for 2006.

8. EXISTING EFFLUENT LIMITS

Outfall 001: dry commodity barge washwater from customer leased barges

Based on BPJ and on permits for similar facilities, no effluent limitations are established for washwaters from barges previously containing dry commodities including: dirt, mud, wood, sand, steel slag, and crushed rocks. Best Management Practices (BMPs) for barge operations are listed in Part II.

Outfall 02A: incoming ballast and void water from customer leased barges

Outfall 02B: maintenance ballast and void water from spar barges

| Pollutant | Monthly Average | Daily Maximum | Frequency |
|-------------------|-----------------|---------------|-----------|
| Flow | Report | Report | 1/week |
| COD | --- | 250 mg/L | 1/week |
| Oil & Grease | --- | 15 mg/L | 1/week |
| pH Min/Max Values | 6.0 (min) | 9.0 (max) | 1/week |

Sampling for Outfall 02B is only required if a visible oil sheen is present.

The measurement frequency for Outfall 02B for the discharge of maintenance ballast water shall be 1/month whenever sampling is required instead of 1/week as stated above.

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 120509 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of

Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for Marmac, LLC

1. **Outfall 001:** dry commodity barge washwater from customer leased barges

Based on BPJ and on permits for similar facilities, no effluent limitations are established for washwaters from barges previously containing dry commodities including: dirt, mud, wood, sand, steel slag, and crushed rocks. Best Management Practices (BMPs) for barge operations are listed in Part II.

2. **Outfall 02A:** incoming ballast and void water from customer leased barges
Outfall 02B: maintenance ballast and void water from spar barges

| <u>Pollutant</u> | <u>Limitation</u> Mthly Avg:Daily Max (mg/l) | <u>Reference</u> |
|------------------|--|-------------------------|
| Flow-MGD | Report:Report | LAC 33:IX.2701.1.1.b |
| COD | ---:250 | Similar Discharges; BPJ |
| Oil and Grease | ---:15 | Similar Discharges; BPJ |
| pH | 6.0 - 9.0 s.u. | Similar Discharges; BPJ |

BPJ Best Professional Judgment

Treatment: none

Monitoring Frequency: Flow, COD, Oil & Grease and pH shall be observed once per week at the point of discharge from the incoming customer leased barge void/wing tanks.

*The measurement frequency for Outfall 02B for the discharge of maintenance ballast and void water shall be 1/month whenever sampling is required.

Limits Justification: Limits and Monitoring Frequency are based on current guidance for similar discharges from other facilities.

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos." This facility does not clean tanks. Only open top barges are cleaned.

Storm Water Pollution Prevention Plan (SWP3) Requirement

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1.b, stormwater discharges that are associated with industrial activity shall be monitored. In accordance with LAC 33:IX.2511.B.14, SIC code 4499 is considered to be associated with industrial activity. However, an SWP3 is not included in the permit because the facility is a water related operation only. Barge BMPs are comparable to the SWP3 requirements; therefore, the barge BMPs will be applied instead.